UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

--x
WEIGANG WANG and HAILONG YU,
on behalf of themselves and others similarly situated
Plaintiffs,

v.

CHAPEI LLC d/b/a Wok Empire,
CHA LEE LO, and JOHN DOES #1-10
Defendants.
--x

Case No: 15-cv-2950 (MAS)(DEA)

NOTICE OF PENDENCY

IMPORTANT NOTICE ADVISING YOU OF YOUR LEGAL RIGHTS

TO: All persons employed after April 24, 2012 at any location of CHAPEI LLC d/b/a Wok Empire ("Wok Empire") "Potential Class Members")

CHAPEI LLC d/b/a Wok Empire, CHA LEE LO, AND JOHN DOES #1-10. and/or any other entities affiliated with or controlled by any one or more of the foregoing business and/or individuals who performed work as a kitchen worker (food preparer and cook) at any one more Wok Empire locations from April 24, 2012 through the present, Corporate officers, shareholders, directors, administrative employees, and other customarily exempt employees are not part of the defined class.

If you worked at any location of Wok Empire at any time since April 24, 2012, the purpose of that Notice is to advise you of this lawsuit, and to further advise you of certain rights you may have with respect to this action.

Plaintiffs WEIGANG YANG and HAILONG YU are former employees of Wok Empire Kitchen who have brought this action on behalf of themselves and Potential Class Members to recover allegedly unpaid minimum wages and overtime compensation (for all hours worked in excess of forty (40) per week) and allegedly improperly withheld wages and tips, for which they claim they have been incorrectly paid.

This lawsuit seeks the payment of minimum wages and overtime wages pursuant to the Fair Labor Standards Act (29 U.S.C. 201 et seq.) and New Jersey State Wage and Hour Law, allegedly owed to current and former employees of Wok Empire who worked as restaurant workers.

You may be owed payment if you are a Potential Class Member and:

(1) Worked overtime during that period;
(2) Did not receive minimum wages for all hours worked; or
(3) Did not have your employment properly recorded.

Defendants vigorously deny any wrongdoing and/or liability to plaintiffs or any Potential Class Member who may allege that he or she was underpaid. Defendants strongly deny that any employee was underpaid for his or her work at any time.

THIS NOTICE is meant to advise you of your right to participate in this lawsuit as a claimant and plaintiff under the Fair Labor Standards Act if you believe that you were underpaid by Chapei LLC d/b/a Wok Empire.

No determination has been made that you are owed any minimum wages, overtime wages or gratuities, and the Court is not endorsing the merits of this lawsuit or advising you to participate in this lawsuit. You are under no obligation to respond to this notice.

If you join in the lawsuit, you may be required to participate in discovery, sit for depositions, or testify in court. If you join in the lawsuit. You will be bound by the Court' judgment in this case.

Federal law prohibits CHAPEI LLC d/b/a Wok Empire, Cha Lee Lo, and John Does #01-10 from retaliating against you in any manner if you wish to join this lawsuit. Federal law also permits you to join in this lawsuit and share in any recovery regardless of your immigration status. You will not be asked to disclose whether you are a citizen or have a green card in order to participate in this collective action.

* * *

FILING THE CONSENT TO JOINDER

If you wish to participate in this lawsuit, you must sign and return the enclosed Consent to Joinder form as directed below. Your consent to Join Lawsuit Form will be filed with the Clerk of the Court on your behalf. If you fail to mail a signed Consent to Joinder form to the Clerk of the Court you will not be eligible to participate in the FLSA portion of this lawsuit. Consent to Joinder forms filed after [90 days from date of Notice] will be rejected.

IF YOU WISH TO FILE A CLAIM FOR UNPAID MINIMUM WAGES AND UNPAID OVERTIME PAY UNDER THE FEDERAL FAIR LABOR STANDARDS ACT, YOU MUST MAIL THE ENCLOSED CONSENT TO JOINDER FORM, POSTMARKED BY [90 DAYS FROM DATE OF NOTICE], 2017 TO:

TROY LAW, PLLC.
41-25 Kissena Boulevard, Suite 119
Flushing, New York, 11355
RE: CHAPEI

If you fail to mail a signed Consent to Join Lawsuit form by [90 DAYS FROM DATE OF NOTICE], 2017, you may not be eligible to participate in the Fair Labor Standards Act portion of this lawsuit.

Troy Law, PLLC., 41-25 Kissena Boulevard, Suite 119, Flushing, New York 11355, Tel: (718) 762-1324, Fax: (718) 762-1342 and FISHER TAUBENFELD LLP, 225 Broadway, Suite 1700, New York, NY 10007, Tel: (212) 571-0700, Fax: (212) 505-2001 represents the Plaintiffs in this case. You will not be required to pay any fee for services provided by Plaintiffs' counsel TROY LAW, PLLC and FISHER TAUBENFELD LLP. If you are represented by Plaintiffs' attorneys, their costs and fees will be paid out of any recovery against Wok Empire. You have a right to consult with an attorney about this matter. If you are represented by other counsel, you may retain another attorney, but you will be responsible for paying that attorney. Further information about this Notice, the deadline for joining the lawsuit, the form provided or answers to other questions concerning this lawsuit may be obtained by contacting the Plaintiffs' attorney John Troy telephone number 718.762.1324, facsimile number 718.762.1342. Any communications with TROY LAW, PLLC. Are ***privileged and confidential*** and will not be disclosed to anyone without your permission.

You have a right to participate in this action even if you are an undocumented alien or if you were paid in cash.

PLEASE DO NOT CONTACT THE CLERK OF THE COURT WITH QUESTIONS INVOLVING THIS LAWSUIT.

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SO ORDERED:

____
U.S.D.J.

Dated: Trenton, New Jersey
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